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ABSTRACT

The primary objective of this statewide evaluation is to discern weaknesses in Florida's State Plan for the administration of vocational education. If the Florida State Plan is to become more than a seldom-read document prepared solely in compliance with federal funding regulations, overall priorities, procedures, and goals for statewide vocational program implementation must be identified. Technical legal deficiencies and areas of ambiguity in the administrative provisions should be corrected. The whole plan should be reviewed and revised in order to increase its value in statewide planning for vocational education. Specifically, target populations needing vocational education should be accurately identified, the labor supply and demand data should be expanded, and all program goals and objectives clearly set forth. Long and short-term priorities for each goal and objective must be specified, data reliability and validity should be assessed, and program plans consistent with the data should be drawn up. Appropriate emphases in program development, identifying specific manpower needs and locations, must be noted in the state guidelines. This document is related to four others, available as VT 019 461-VT 019 464 in this issue. (AG)

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VOL. 1

ED 074222

AN EVALUATION OF THE FLORIDA STATE PLAN FOR THE ADMINISTRATION OF VOCATIONAL EDUCATION

Statewide Evaluation of
Vocational–Technical Education in Florida
Richard H. P. Kraft, Project Director

FLORIDA STATE UNIVERSITY
1972

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Statewide Evaluation of
Vocational–Technical Education
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THE FLORIDA STATE UNIVERSITY
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1972

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DEPARTMENT OF EDUCATIONAL ADMINISTRATION

COLLEGE OF EDUCATION

July 19, 1972

Mr. John H. Hinman, Chairman
Florida State Advisory Council
on Vocational & Technical Education
Suite 752 - Tallahassee Bank & Trust
Tallahassee, Florida 32304

Dear Mr. Hinman:

The Study Group for Florida Statewide Evaluation of Vocational-Technical Education submits to you the following evaluation reports on Vocational-Technical Education in Florida for the school year 1971-72:

1. An Assessment of Goals and Priorities in Florida's State Plan for Vocational-Technical Education

2. Benefit-Cost Comparison of Vocational Education Programs

3. The Role of Florida Vocational-Technical Education in Providing Services for the Handicapped

4. Expectations and Satisfactions of Parents and Students with Vocational-Technical Education

5. Continued Evaluation of a Management Information System for Vocational-Technical Education

It is our hope that these reports will be helpful to all who are concerned with strengthening the State's comprehensive system of vocational-technical education.

Respectfully,

Richard H. P. Kraft

Richard H. P. Kraft
Associate Professor

RHPK/nm

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I

INTRODUCTION

Public Law 90-576, the Amendments to the Vocational Act of 1963, Section 123(a), stipulates that "any State desiring to receive the amount for which it is eligible for any fiscal year pursuant to this title shall submit a State Plan at such time, in such detail, and containing such information as the Commissioner deems necessary, which meets the requirements set forth in this title."

Florida participates in the funds of this act and must therefore prepare a State Plan which meets federal requirements. According to the act, three sections of a State Plan must be prepared: (1) Continuing Administrative Provisions, (2) Long-Range Program Plan, and (3) Annual Program Plan. The latter two must be revised and updated annually, while the Administrative Provisions require revision only when there is a change in administrative procedures.

To determine the extent to which Florida's State Plan complies with the requirements of the amendments and pertinent federal regulations codified in "The Code of

Federal Regulations" (hereafter cited as CFR), an evaluative review of these three sections of the State Plan has been performed. The CFR, updated and current as of December 6, 1971, and the document, "The Guide for the Development of a State Plan for the Administration of Vocational Education Under the Vocational Education Amendments of 1968,"[1] were used as guidelines in performing this evaluation.

In addition to a technical review of the required provisions of the Florida Plan, special emphasis was placed on the goals of the Florida State Advisory Council on Vocational and Technical Education which suggests that evaluation should focus on the State's goals and priorities as set forth in the Plan. In this regard, consideration was given not only to the technical requirements of the Plan but also to the clarity of language and presentation within the limits allowed by federal regulations.

The primary objective of this evaluation is to discern weak areas and sections of the State Plan; however, this is not to suggest that there are no commendable sections. Having evolved over a period of several years, Florida's State Plan continually becomes more comprehensive and better portrays the future and the progress of vocational education. It is hoped that the evaluations and

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[1]Prepared by the U.S. Department of Health, Education and Welfare, U.S. Office of Education.

recommendations that follow will assist the State Advisory Council and the State Board of Education in formulating, revising, and updating future State Plans.

Due to the length of the primary documents involved, only reference or brief descriptions of the sections under review are included in this evaluation report. Therefore, in order to enhance the value of the evaluation and recommendations contained herein, it is advisable that the reader review appropriate parts of the primary documents.

II

RULES AND REGULATIONS COMPLIANCE: PART I, ADMINISTRATIVE PROVISIONS

Part I of the State Plan when submitted and approved by the U.S. Commissioner of Education became, in fact, a contract between the State and Federal Government. Its provisions, until amended, are binding upon the State Board of Education in the administration of vocational education programs and services. The legalistic nature of Part I of the Plan as compared with the more flexible Parts II and III, necessitates a different approach to its analysis.

The procedure used in the examination of Part I consisted of an item by item comparison of the State Plan with the requirements of the Amendments to the Vocational Act of 1963 and the regulations promulgated thereunder. The importance ascribed to the federal regulations results from their legal status. They were prepared by the U.S. Office of Education to interpret the 1968 Vocational Education Amendments and the intent of Congress in passing this legislation was revealed in congressional hearings. These rules and regulations serve as the legal base for program development and,

since publication in the Federal Register, have the effect of law. In addition to the federal act and regulations, "Guides for the Development of a State Plan for the Administration of Vocational Education Under the Vocational Amendments of 1968" published by the U.S. Office of Education also was examined.

The primary objective of the evaluation of Part I is to identify weaknesses or discrepancies in the State Plan and to suggest areas for future revision. It is not intended to be a critique of the discretion exercised in the development of the State Plan. However, provisions which appear to violate the letter or spirit of the law or regulations have been noted. Finally, no specific mention is made of sections which fail to exercise available discretion, but numerous examples can be identified and may constitute an area for future study.

Because of the detailed and technical nature of the provisions of Part I of the Florida Plan, the report is organized according to the numbering system employed in Part I. Comments concerning individual sections, as appropriate, follow this sequence. To assist in the review of the evaluation an annotated Table of Contents to Part I of the State Plan citing the applicable sections of Public Law 90-576 or the Federal Code of Regulationshas been provided as an appendix.

1.0 GENERAL.

45 CFR 102.32(b) requires that copies of, or citations to, all pertinent laws and interpretations of laws by appropriate state officials or courts shall be included as part of the State Plan.

A review should be initiated to determine whether or not any court opinions or opinions of the Attorney General of the State of Florida have been rendered since the Plan was written. If opinions have been rendered, they should be added to the State Plan in Section 1.12.

1.33 TEACHER EDUCATION PERSONNEL.

45 CFR 102.38(a) requires the State Plan to set forth minimum qualifications for teachers including, in part, the following: "Such qualifications shall contain standards of experience and education and other requirements which are reasonable in relation to the duties to be performed, including recent experience and association with the groups of persons to be served, such as disadvantaged persons."

Section 1.33 of the State Plan contains no specific requirement concerning recent experience and association with the specific populations to be served by the federal act (e.g., disadvantaged).

1.41-1 PRESERVICE TEACHER EDUCATION.

45 CFR 102.9(b) sets forth the regulations governing the training of personnel. It provides that such training may be provided either by the State Board of Education or private agencies or institutions. When such training is provided by such an agency or institution, the State Board shall enter into cooperative written agreements with such agency or institution. It further provides that "these agreements shall describe the training program developed by the State Board of Education in cooperation with such agency or institution, and the policies and procedures which the State Board and the agency or institution agree to utilize in evaluating the effectiveness of the program so described."

The provisions of Section 1.41-1 of the State Plan merely provide for the execution of a written agreement whereas the regulation makes such an agreement mandatory. Emphasis also should be given to the cooperative nature of such an agreement together with an outline of the required provisions thereof.

1.5 PROGRAM EVALUATION.

45 CFR 102.36(c) sets forth the required provisions of the State Plan concerning program evaluations. Included within these requirements are the identification of the agencies and institutions responsible for making periodic

evaluations, the frequency of these evaluations, and an outline of the type of evaluations involved.

Section 1.51, State Program, in the State Plan, does not establish the procedures to be followed in conducting periodic evaluations, nor does it specify the types of evaluations to be conducted.

Section 1.52, Local Programs, does not provide for periodic evaluations as required by the regulation. Continuous evaluation as therein provided should be an integral part of any ongoing program and would not appear to satisfy the intent of a requirement for periodic evaluations.

1.6 STATE REPORTS.

45 CFR 102.39 sets forth the requirements of the State Plan concerning state reports. It requires the filing of an Annual Education Report and Report of Program Activities. Section 1.6 of the State Plan could be clarified so as to indicate a responsibility for the timely filing of the reports specified in the regulation in addition to the promulgation of general cooperation with the U.S. Commissioner of Education.

1.7 COOPERATIVE AGREEMENTS.

45 CFR 102.40(a) requires that the cooperative agreement between the Public Employment Service System and the State Board of Education will provide for the exchange

of certain specified information including occupational opportunities and qualifications of persons completing vocational courses. In addition to the exchange of such information this paragraph of the regulation specified that the State Plan shall provide how such information will be utilized in vocational planning and counseling.

In Section 1.71, State Employment Service, of the State Plan, the copy of the required cooperative agreement, attached to the Plan, does not establish how the required information provided by the parties to the agreement will be utilized for vocational counseling.

45 CFR 102.40(c) sets forth the requirements of the State Plan regarding cooperative agreements with other agencies, organizations, and institutions. It specified, in part, that "a State Plan shall provide that in the development of vocational education programs, services, and activities there may be, in addition to the cooperative arrangements referred to above, cooperative arrangements with other agencies, organizations, and institutions concerned with manpower needs and job opportunities." The phrase "concerned with manpower needs and job opportunities" as contained in this regulation, describes the types of local agencies and institutions with which cooperative agreements are authorized.

Section 1.73, Other Agencies, of the State Plan,

restricts these cooperative agreements to identification of manpower needs and job opportunities and requirements. This emphasis upon purposes rather than types of agencies would seem to be more restrictive than required by the regulations. In addition, the State Plan is ambiguous relative to its requirements for notice and filing of agreements which are entered subsequent to the filing of the original plan.

1.8 VOCATIONAL EDUCATION UNDER CONTRACT.

45 CFR 102.5(a) sets forth the requirement for providing vocational instruction under contract. It requires that a contract shall incorporate the standards and requirements for vocational education set forth in the federal regulations and the State Plan.

Section 1.8 of the State Plan merely provides that the contract contain "the standards to be met." Greater clarity would be achieved with regard to this point if the Plan specified that contracts executed under this Section must include all of the standards contained in the Title 45, Part 102, as well as any additional requirements of the State Plan.

1.10A EFFECTIVE USE OF RESULTS OF PROGRAMS AND EXPERIENCE.

45 CFR 102.41 sets forth the requirements of the

State Plan concerning effective use of program results and experience. It requires, in part, that the State Plan shall provide for the effective use of the results and experiences of other programs and projects assisted under other parts of the act, including direct grants and contracts by the U.S. Commissioner of Education under the regulations in Title 45, Part 103. In addition, it requires that "the State Plan shall also describe the policies and procedures to be followed by the State Board in assuring such effective use."

Section 1.10A of the State Plan refers to information from programs assisted under Parts C and I of the Act and apparently does not include projects under Section 142(c) of Part D which is included in Title 45, Part 103. In addition, more effective language could be incorporated in 1.10A-3 to specify the policies and procedures to be followed by the State Board to assure effective use of this information. This Section of the State Plan merely specifies purposes and not the procedures for use of the information.

1.10B OPPORTUNITY FOR HEARING ON LOCAL APPLICATIONS.

45 CFR 102.43 sets forth the requirements of the State Plan concerning opportunity for hearing on local applications. It specifies, in part, that the State Plan

shall provide that any local educational agency which is dissatisfied with the final action regarding any application for funds under the act shall be given reasonable notice and opportunity for a hearing before a board or official designated by the State Board of Education for this purpose and specified in the State Plan. It further requires procedures for affording local educational agencies reasonable notice and opportunity for a hearing, for conducting such a hearing, for providing a written record of the hearing, and for informing local educational agencies in writing of the decision and the reasons therefor.

In conformity with the intent of Section 102.43 of the regulations, several modifications in the State Plan are suggested. Under Section 1.10B-1 of the State Plan notification to the local educational agency should be required to be in writing. The reasonableness of a maximum of ten days for notification to the State Board of dissatisfaction with a decision should be reviewed.

The appeal procedure as specified in Section 1.10B-2 of the State Plan does not appear to be delineated clearly. The ultimate appeal authority appears to be an impartial panel which is not sufficiently identified as required by the regulations. In addition, no requirement is included for written notification of its decision and the reasons therefor.

In view of the provision in the act requiring an appeal by local agencies to the U.S. Court of Appeals, to be filed within sixty days after final action or notice thereof, whichever is later, this Section should be amended to indicate clearly which action in the appeal process constitutes final action for the purpose of establishing the commencement of the sixty-day period. Sufficient notice allowing ample opportunity to prepare for such an appeal should also be provided.

1.10C ECONOMICALLY DEPRESSED AREAS OR HIGH UNEMPLOYMENT AREAS.

45 CFR 102.45 sets forth the regulations concerning the designation of economically depressed or high unemployment areas. This section of the regulations requires, in part, that the State Plan rely upon determinations made by the Secretary of Commerce unless the State Board determines that the use of such a determination is impractical or undesirable either because the areas so designated are too large in size or too few or many in number. The State Board may then designate such other areas or communities in the state of smaller size which, on the basis of most recent information available to it, meet either of the following criteria: (1) the current rate of unemployment is at least 6 per cent; or (2) the median family income in the area is not more than 40 per cent of the national median.

Section 1.10C of the State Plan does not indicate that a determination nor the criteria for such a determination have been made which authorize the use of an alternative designation of economically depressed areas. Areas established by the Cooperative Area Manpower Planning Systems committee do not appear to be authorized by the regulations, nor is it clear that the areas designated are smaller in size, thus meeting the specified criteria. The State Plan allows designation of areas other than those by the Secretary of Commerce while the regulation only provides for additional areas. The criteria established for the designation of the remaining districts do not insure that the requirements of the regulations concerning unemployment rate or mean family income will be met prior to such a designation.

1.10D AREAS OF HIGH YOUTH UNEMPLOYMENT OR SCHOOL DROPOUTS.

45 CFR 102.46(a) sets forth the criteria to be used by the State Board in determining designated areas of high concentration of unemployed youth or school dropouts. It provides for such a designation for areas having a current rate of youth unemployment of at least 12 per cent or a current school dropout rate in excess of the overall state school dropout rate.

Section 1.10D of the State Plan does not appear to

set forth sufficient criteria to insure that the State Board will make designations in accordance with the criteria set forth in the federal regulations. In addition, the sources of information on youth unemployment rates, the age range of youth included in such information, and the frequency with which this information is updated, as required by the federal regulations, are not provided in this Section.

3.15 VOCATIONAL EDUCATION NEEDS OF GROUPS TO BE SERVED.

45 CFR 102.51 sets forth the requirements for allocation of funds to Part B purposes. Sub-paragraph (d) (5) thereof requires that the State Plan assure that due consideration be given to the relative vocational education needs of each of the population groups specified in paragraph (a) of Section 102.51, particularly disadvantaged or handicapped persons.

The procedures outlined in Section 3.15 of the State Plan offer little assurance of any particular emphasis on or consideration of the handicapped and disadvantaged groups.

3.24 MAINTENANCE OF EFFORT.

45 CFR 102.58 sets forth the federal requirement that the State Plan shall provide assurances that federal funds made available for Part B purposes will not supplant state or local funds. The provisions of the federal

regulations are too lengthy to include in this paper but several possible discrepancies in this Section should be noted.

The determination of maintenance of effort required under the regulation refers to a preceding fiscal year and requires that it not be less than the second preceding year by more than 5 per cent. The provisions of the State Plan appear to deviate from this requirement. In addition, it should be noted that the regulation refers to a per student expenditure rather than a total expenditure as apparently provided for in the State Plan.

Regarding unusual circumstances which might excuse the failure to meet the requirements of maintenance of effort, the State Plan should provide for unforeseen decreases in revenue due to removal of a large segment of property from the tax rolls, or other causes.

3.25-2 REASONABLE TAX EFFORT.

45 CFR 102.57 sets forth the requirements of the State Plan to insure a reasonable tax effort on the part of local educational agencies. In view of Florida's selection of an alternative method of determining reasonable tax effort, the procedure for determining the state's statutory minimum or a legal citation to such authority should be included.

3.26-1 MANPOWER NEEDS AND JOB OPPORTUNITIES.

45 CFR 102.53 sets forth the requirements of the State Plan to assure that due consideration is given to projected manpower needs and job opportunities, particularly new and emerging manpower needs and opportunities on a local, state, and national level.

The provisions of Section 3.26-1 of the State Plan make no reference to new and emerging manpower needs and opportunities. This is a key area of emphasis in the federal regulations but appears to receive no explicit consideration in the State Plan.

3.26-3 RELATIVE ABILITY TO PROVIDE RESOURCES.

45 CFR 102.55 sets forth the requirements of the State Plan to insure that the State Board will give due consideration to the relative ability of local educational agencies to provide the resources necessary to meet the vocational education needs in their area. This section of the federal regulations provides for two classifications of areas, the first being those designated as economically depressed or high unemployment areas which shall receive priority, with all remaining areas falling into a second class. Within these two classes specific procedures are prescribed for determining relative priorities.

The provisions of Section 3.26-3 of the State Plan

set forth in detail the procedures for determining priorities within classes but do not clearly establish the priority of Class I areas (i.e., economically depressed or high unemployment), over the remaining areas. The existence of priority between classes as well as within classes should be clarified and emphasized.

3.27 APPLICATION OF CRITERIA IN DETERMINING THE RELATIVE PRIORITY OF LOCAL APPLICATIONS.

45 CFR 102.52(c) (3) requires that the State Plan describe the method by which the State Board will use the criteria set forth in the State Plan, pursuant to subparagraph (2) of Section 102.52 and Section 102.53 through 102.56, including an explanantion of how it will weight their relative importance in reaching allocation decisions.

Section 3.27 is a key item in the overall State Plan. It should express in practical monetary terms the goals and purposes of the entire vocational education program for the State of Florida. As presently written, this Section provides maximum flexibility but little direction or guidance. Priorities among local educational agencies are established from a weighted scale (Section 3.27-1). However, no fixed procedure is established for the weighting nor is balance among the various weighted items assured. Priority is provided for designated redevelopment areas but priorities among this group are not established. Finally, the

translation of these priorities into specific funding is not discussed.

Section 3.26 of the State Plan sets forth in great detail criteria for determining relative priorities of local applications. However, the ratings scale provided in Sections 3.27-1 and 3.27-2 does not provide for consideration of all the required criteria.

5.21-6 APPLICATION PROCEDURES FOR PROJECTS OF LOCAL EDUCATIONAL AGENCIES.

45 CFR 102.72(c) (2) requires that the State Plan shall "provide that any deferral or disapproval of an application will not preclude its reconsideration or resubmission."

The language contained in Section 5.23 of the State Plan should be clarified so as to insure that disapproval does not effectively preclude resubmission. In this regard, specifications of resubmission procedures might be helpful.

8.0 CONSUMER AND HOME MAKING EDUCATION.

45 CFR 102.93 established minimum criteria to be included in the State Plan for State Board approval of a consumer or homemaking educational program. Sub-paragraph (e) of Section 102.93 provides that "the program will include consumer education as an integral part thereof, including promotion of nutritional knowledge and food use and purchase."

The criteria listed in Section 8.2 of the State Plan fail to include the items required by 102.93(e).

9.0 COOPERATIVE VOCATIONAL EDUCATIONAL PROGRAM.

45 CFR 102.97 sets forth the requirements of the State Plan concerning approval of cooperative vocational and educational programs. It requires that the State Plan shall "set forth the principles for determining the priorities to be accorded applications from local educational agencies for cooperative vocational educational programs, with preference being given to applications submitted by local educational agencies serving areas of high concentrations of youth unemployment or school dropouts, as determined pursuant to Section 102.46."

The provisions of Section 9 of the State Plan, particularly Section 9.12, Review of Applications, does not insure priority to the local agencies required by the federal regulations. The procedure established in Section 3.27 and incorporated, by reference, in this part would be insufficient to assure the specific preference required by the regulations.

Section 9.22, On-The-Job Training Standards, of the State Plan should be rewritten to incorporate all of the standards specified in 45 CFR 102.98(b), including the requirement that it be conducted in accordance with a written cooperating agreement.

Section 9.24, Additional Costs to Employers, of the State Plan should be clarified to insure that it complies with the provisions of 45 CFR 102.100(a) (2) in the determination of added employer cost.

10.0 WORK-STUDY PROGRAMS FOR VOCATIONAL EDUCATION STUDENTS.

45 CFR 102.11 sets forth the requirement of the State Plan concerning policies and procedures for approval of a work-study program. Under this regulation the State Plan "must set forth principles for determining the priority to be accorded applications from local educational agencies for work-study programs, giving preference to applications submitted from local educational agencies serving in the cities with high concentration of youth unemployment or school dropouts, as determined pursuant to Section 102.46."

The provisions of Section 10.12, Review of Applications, of the State Plan, incorporating by reference Sub-Sections 1.10c and 1.10d as the procedure for establishing priorities, would benefit by clarification. These two Sub-Sections merely set forth criteria for determining economically depressed, high youth unemployment, and school dropout areas. Although by implication they provide some assurance of compliance, nothing contained in these two Sub-Sections specifically provides for the assignment of priorities.

III

RULES AND REGULATIONS COMPLIANCE: PARTS II AND III, LONG RANGE AND ANNUAL PROGRAM PROVISIONS

Title 45, Code of Federal Regulations, Part 102, and the Amendments to the Act were reviewed in order to establish criteria against which evaluations of the Florida State Plan, Parts II and III, could be based. Systematically listed below are these criteria and evaluations of Parts II and III of the 1972 Florida State Plan.

Criterion: 45 CFR 102.33 requires the State Plan to extend over five years beginning in the fiscal year for which it is submitted.

Evaluation: Part II establishes baseline data for the year 1970 and projections for the years 1972 through 1976 which comply with the requirement.

Criterion: 45 CFR 102.33 stipulates that the State Plan shall describe the present and projected vocational education needs of the State. Section 123 (6) of the Amendments of 1968 discusses State Plan preparation and states: "due consideration will be given to the results of periodic

evaluations of State and local vocational programs, services and activities in the light of information regarding current and projected manpower needs and opportunities on the local, State and national levels." The Amendments also provide for the State Employment Service, through agreement with the State Board for Vocational Education, to provide some of this information. The information secured from the employment service should be supplemented with information from other agencies and organizations concerned with manpower needs and job opportunities.

Evaluation: Part II, Table I, Employment Opportunities Related to Vocational Education Program, Labor Demand and Supply Summary, for the fiscal year ending June 30, 1971 (1971 State Plan), when compared to the corresponding table in the 1972 State Plan, reveals inadequacies and inconsistencies of data. For example, the following comparison and analysis between the 1971 and 1972 tables for O.E. code 14.0, Office Occupations, illustrates the point. (See page 24.)

As can readily be seen, the "Current Employment" change between 1969 and 1970 amounts to an increase of about 171,500, while the "Vocational Education Output" was placed at 23,677 in 1971, and "Other Sector Output" for 1971 was 8,069. The question then is "where did the other 140,000 trained people come from?" There are two possible

Comparison and analysis between the 1971 and 1971 tables for O.E. Code, 14.0, Office Occupations:

State Plan	Instructional Program	Current Employment 1969[a]-1970[b]	Projected Labor Demand 1971[a]-1972[b]	Projected Labor Demand 1975[a]-1976[b]
1971	Office Occupations	441,423	88,550	222,481
1972	Office Occupations	612,999	45,459	50,870

		Vocational Education Output 1971[a]-1972[b]	Vocational Education Output 1975[a]-1976[b]	Other Sectors Output 1971[a]-1972[b]	Other Sectors Output 1975[a]-1976[b]
1971	Office Occupations	23,677	29,861	8,069	8,920
1972	Office Occupations	17,031	19,143	10,645	11,767

[a]Year of 1971 plan data.

[b]Year of 1972 plan data.

explanations for this glaring difference. First, "Other Sector Output" does not consider output from private schools. Considering the large number of private schools which produce trained personnel in this particular field of work, the omission of private school production here, as well as for other OE Codes of Instructional Programs, very probably contributes significantly to the distortion of the total output figure for skilled persons for a particular field of work. Second, the labor force is very mobile, both in terms of geographic migration and occupational change. If the demand is great for office occupation work, then it is very likely that persons moved from other states and other occupations to fill such positions. Neither of these situations are dealt with in these tables.

When these data are referred to as one reads Part III of the 1972 Plan, an inconsistency is observed. In the 1972 Annual Program Plan under Instructional Program, Secondary, Section 2.12-1, it is stated that "The number of cooperative business education and vocational office education programs will increase. . . ."; under Section 2.12-2 it is stated, "Programs in business education to be expanded include accounting and computing; data processing; filing, office machines, general office work; information and communications; materials support; personnel training; stenography; supervision and administrative management; and

typing." Under Section 2.12-3, Adults, it is stated, "Present plans include expanding the existing programs in office education reported in 2.12-2 of this part"; under Section 2.12-4, Disadvantaged Persons, it is stated, "Additional programs in business education will be provided in high schools and in correctional institutions."

Thus, at a time when the "Projected Labor Demand" has dramatically decreased (from 88,550 in 1971 to 45,459 in 1972 and from 222,481 in 1975 to 50,970 in 1976) for Office Occupation personnel, the State Board is planning to expand these very kinds of programs. The stated "Vocational Output" in these tables similarly shows a decline in the projected labor supply from 1971 to 1972 and from 1975 to 1976. While the decreased output figures are consistent with the decreased labor demand cited in Table 1, they are inconsistent with the new and expanding programs.

Another inconsistency in Table 1 and the ensuing long range plan appears in the areas of construction workers. The only such occupations identifiable from this table are OE Codes 17.1001 and 18.230, carpenter and metal worker, respectively. The Expansion and Replacement Need for the long range period 1972-1976 is from 2,450 to 2,482 for carpenters and from 1,020 to 1,033 for metal workers. These figures do not suggest a significant rate of growth. However, Section 4.0, Vocational Education Program Needs, Part II, states that

"Other areas to be emphasized are the need for . . . expanded programs to meet the anticipated needs of the construction industry." From labor supply and demand data given in the State Plan one cannot determine if these needs do, in fact, exist and if they do, where in the State they exist.

These data inconsistencies have been detailed only for three occupations, but similar discrepancies also exist for other occupations. Rather than go into those, suffice it to say that this important table needs more reliable data and once such data has been supplied, program plans should maintain consistency with that data.

Several other criticisms of this table follow. One, the OE Codes of Instructional Programs have only a minimal amount of detailed data. For example, under the major heading of Office Occupations (14.0) only two such occupations (1) bookkeeper and accountant, and (2) steno, typist and secretary, are listed in the 1972 Plan while the 1971 Plan additionally listed the occupation of office machine operations. The point is that most vocational programs are based upon entry level skills for a particular occupation and if programs are to be planned using labor market data, then such data should closely correspond to particular occupations. This will be true for most cases except when a program includes a cluster approach whereby several skills are included

in a single program. Two, the source of "Projected Expansion and Replacement Needs" is only from the Division of Administration, Florida Department of Commerce. It is suggested that the following sources of information may be considered in assessing manpower needs and job opportunities:

a. Employment Service--Reports and Statistics
b. Manpower Reports of the President transmitted to Congress by the U.S. Department of Labor annually
c. U.S. Census of Population, Bureau of the Census, Department of Commerce
d. Comprehensive Area Manpower Planning Systems Report
e. Manpower surveys made by organizations and agencies within the State
f. State Departments of Government, such as: State Departments of Labor, Interior, Commerce, Industrial Development, or other departments concerned with economic growth of the State.
g. Reports from the State Department of Education
h. State and Federal Licensing Boards
j. Advisory and Trade Committees[1]

The location in the State of various labor market supplies and demands should be considered explicitly in future plans. While it has already been cited that the labor force is mobile, it would, nevertheless, facilitate meeting the needs of both students and the labor force by commencing new programs in areas where there is an excess demand for labor. If students do not reside in that particular geographic location, then the feasibility of providing residential facilities should be considered.

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[1]E. P. Hilton and Steven J. Gyuro, A Systems Approach 1970: Vocational Education Handbook for State Plan Development and Preparation (Frankfort, Kentucky: State Department of Education, 1970), pp. 39-40.

It is recommended that in Table I:

1. more detailed OE Codes of Occupations be included;
2. more sources be exploited for Expansion and Replacement Needs, including area skill surveys;
3. private school output be included in Other Sector Output;
4. migration coefficients be applied to projected labor supply and demand (not all of those trained in Vocational Education will remain in the State);
5. occupational mobility coefficients be applied to projected labor supply and demand (not all persons trained in a given occupation actually will work in that occupation);
6. high and low supply and demand occupations be identified according to specific geographic areas of the State.

Criterion: 45 CFR 102.34 stipulates that the annual program plan (Part III) shall describe how and to what extent such programs, services, and activities will carry out the program objective set forth in the long range program plan, Part II.

Evaluation: The Annual Program Plan Provisions, Part III, Section 2.0, State Vocational Education Program, depicts by types of persons to be served (secondary, post-secondary, adult, disadvantaged, and handicapped) the means for obtaining the long range goals and objectives delineated

in Part II, Section 5.0. Analyzing the State Plan for each category of persons to be served separately will highlight the attributes and drawbacks of this important section in determining which goals are appropriate and how they will be achieved.

Section 2.12, Part III, Secondary Persons, lists in brief narrative form which enrollments will increase. This would be clearer and briefer if it were treated in a table. However, rigid federal guidelines do not suggest this. Also listed are programs to be added and programs to be improved. Sometimes specific numbers of programs are listed as being added or improved while at other times the words "additional programs" or "programs will increase" are used. These nebulous phrases make the reader wonder whether flexibility in terms of numbers is desired on the part of the State Board or whether the number is simply unknown or so doubtful as not to be listed.

Section 2.12-2, Post-Secondary Persons, similarly lists increased enrollment expected in vocational areas (agricultural, office education, etc.). Again, this could easily be treated in a table. The next heading in this Section is "making programs compatible with labor market needs and student interests." Following this broad heading is a variety of statements concerning programs and activities which will be commenced, expanded, or modified during the

year, some of which do not relate to the heading and most of which are isolated statements about what will occur during the ensuing year.

Section 2.12-4, Disadvantaged Persons, states: "Service to disadvantaged persons is one of the major goals of the Division . . . ." If one assumes that where a statement such as "major goal" does not appear, that such a service or activity is a relatively minor or secondary goal of the Division, then most services and activities would be of minor or secondary importance. However, as presented, one cannot be assured of what the priorities really are. Thus, it is recommended that a priority rating scheme be developed and integrated into Section 2.0, Part III, as well as into other Sections.

In addition, Section 2.12-4 also lists increased enrollments and the addition and modification of programs to "more nearly meet the needs of people." Both a positive and a negative criticism result from this Section when the following sentence is read: "Programs will be expanded for disadvantaged persons in areas identified as depressed in this Plan." On the positive side, it is commendable that expanded programs for disadvantaged are given a geographical designation. However, a negative criticism arises when the reader attempts to find the "depressed" area identified in the State Plan. Sections 2.1 and 2.2, Part II, provide maps

alluding to "depressed" areas but because of different primary data sources yield significantly different information. The areas, then, which are "depressed" are unclear to the reader.

Section 2.12-5, Part III, Handicapped Persons, states: "Increased service to handicapped persons is also a major goal of the Division in FY 1971-1972. . . ." Again, the preceding remark concerning priority determination applies here.

Section 2.13, Part III, Geographic Areas to be Served, gives criteria and guidelines for disbursing funds for categories of persons and service to geographic areas. This type of information, however, appears to be of an administrative nature rather than one which sets forth an annual plan relative to where funds will be disbursed during FY 1971-1972. Thus, it is recommended that this Section include the amount of funds to be disbursed during FY 1971-1972 by specific geographical locations, such as economically depressed and high unemployment areas. Another criticism of this Section, especially Sections 2.13-1 and 2.13-2, is that it is exactly repetitive of Sections 2.1 and 2.2, Part II. Such unnecessary duplication should be avoided. Instead, charts or maps showing funds, activities, services or enrollments should be substituted for the present maps.

Criterion: 45 CFR 102.34(e) requires the annual program plan to describe the extent to which consideration was given to the findings and recommendations of (1) the most recent evaluation report of the State Advisory Council, and (2) other evaluation reports and studies. Additionally, Section 123(a) of the Amendments of 1968 requires that in order for any State to receive funds, it shall submit a State Plan which meets the requirements set forth in this title. Section 123(a) (5) of the Amendments of 1968 also sets forth certain requirements for the annual program plan which includes that such plan "indicates the extent to which consideration was given to the findings and recommendations of the State Advisory Council in its most recent evaluation report submitted pursuant to Section 104."

Evaluation: As required by 45 CFR 102.23(c), the State Advisory Council prepared recommendations based upon its 1970 statewide evaluation of vocational-technical education. Pursuant to its publication, Vocational-Technical Education in Human Resource Development, Statewide Evaluation, 1970, the Division of Vocational, Technical and Adult Education issued a paper on April 12, 1971 entitled "A Summary of Activities Designed to Achieve Recommendations of the State Advisory Council on Vocational and Technical Education." This twenty-two page paper responds individually and directly to each of the fifty-five recommendations presented by the

State Advisory Council evaluation. While the disposition of all these recommendations is not possible in the State Plan because of the repetition of some and the detail of others, it is, nevertheless, desirable that many more of the dispositions of these recommendations should be included in the State Plan. Perhaps the single most constraining factor which did not permit their inclusion is the rigid structure mandated by the USOE in the preparation of the State Plan.[1] In order to insure compliance with this part of the regulations and to increase awareness of the implementation of these recommendations, it is suggested that they be explicitly incorporated into Part III. This may be accomplished through incorporation by reference to the total document or by appropriate footnotes for specific activities designed to achieve the recommendations.

Criterion: 45 CFR 102.33 requires the State Plan to set forth a program of vocational education objectives which afford satisfactory assurance of substantial progress toward meeting the vocational education needs of the potential students in the State.

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[1]A quite rigorous structure is outlined in U.S., Department of Health, Education and Welfare, Office of Education, "Guide for the Development of a State Plan for the Administration of Vocational Education under the Vocational Education Amendments of 1968" (Washington, D.C.: Government Printing Office, January, 1971).

Evaluation: The interpretation and understanding of the Plan in terms of specifically identifying goals, objectives, and priorities is sometimes an illusive task which the reader of the Plan must perform. At other times, however, for example in Sections 4.0 and 5.0, Part II, Vocational Program Needs and Vocational Education Objectives, goals and objectives are specifically and clearly delineated. The only criticism of these outlined goals and objectives is the lack of a rationale for arriving at such exact and precise numbers, e.g., 57 per cent of all students should receive two years of direct job-related instruction before graduating from or leaving high school.

According to the Missouri 1971 Annual Vocational Education Report:

> . . . a plan is by definition a scheme, a design, or a plot of what we know about where we are, where we would like to go, and some mechanism or vehicle showing how to get there. This design, of course, includes priorities which show, at the State level, which items are considered of greater import than others and will even, in the rationale, explain the derivation of the priorities.

As has been stated in this report, The Florida State Plan only infrequently includes priority rankings and rarely gives sufficient rationale for the reader to deduce what the priorities might be.

In Part II, there are only two direct implications of the setting of priorities. The first appears in

Section 5.0 when it is stated:

> Meeting the Division's objectives is premised upon receiving adequate funding support to provide the needed services as scheduled. If funding support necessary to meet the established needs does not become available, priority will be placed upon expanding and improving programs at the secondary, post-secondary and adult levels, and programs designed to fit the needs of disadvantaged and handicapped persons. However, limited funding will preclude full funding for occupational orientation programs on the elementary-junior high school level.

As between secondary, post-secondary, adult, disadvantaged, and handicapped, no priorities are cited.

The second instance of a priority scheme in Part II appears in Section 5.61, Special Program Research. Here the State's priorities in terms of 1, 2, and 3 are indicated in accomplishing objectives of the Research Coordinating Unit. It is recommended that a similar format be used in stating priorities in other sections of the Plan.

Part III contains several suggestions of priorities but, like Part II, does not explicitly promulgate a rank order determination of priorities of goals and objectives to be achieved during 1972. Rather, terminology such as "one of the major goals," "emphasize," "particular emphasis," and "special attention," must be gleaned and taken as indicative of some kind of top order priority. The result of the repeated use of this kind of terminology is to place the burden of determining superordinate and subordinate goals and objectives upon the reader of the State Plan. Instead, it is

recommended that a priority classification system be devised (e.g., numbers one through five or ten) with each goal and objective being assigned a rank order.

Throughout Part II the tables which cite the enrollments to be served in terms of secondary, post-secondary, adult, disadvantaged, and handicapped are all consistent with the previously stated goals in Sections 4.0 and 5.0, Part II. A major weakness, however, is the failure to relate long range goals to the long range labor supply and demand and to the depressed areas of the State.

Criterion: 45 CFR 102.34 requires the annual program plan to describe the content of vocational education programs, services, and activities during the year for which Federal funds are sought.

Evaluation: Section 2.0, State Vocational Education Program, Part III, describes programs, services, and activities primarily in terms of anticipated achievement levels (e.g., enrollments, number of program offerings, and types of research and development activities) rather than in terms of content. Because of the numbers of programs, services, and activities contained in this part, it does not appear feasible to describe the content; instead, an addendum might be prepared to comply with this regulation.

Criterion: 45 CFR 102.34 requires the annual program plan to describe the allocation of Federal and State Vocational funds to the programs, services, and activities during the year in which the Federal funds are sought.

Evaluation: Table 1, Part III, satisfactorily describes the estimated allocation of funds for state vocational education programs. Delineating state, federal, and local sources of funds, this part also details allocation by category of persons to be served, services (e.g., guidance and counseling), and activities.

IV

DATA VALIDITY IN PARTS II AND III

Data validity can be described as the extent to which an instrument or technique is measuring what it is intended to measure. The validity of the data arrived at by a particular technique is also inextricably interrelated with its reliability (reliability being the consistent measure of the same data over time). Adequate sampling and reliability are necessary, but not sufficient conditions for validity. A technique or instrument which is not reliable cannot be valid. But a technique or instrument for measuring which is not a valid measure of what it claims to measure may nevertheless be reliable.

In this light, data in the State Plan were examined and analyzed in terms of the relationship of data between Parts II and III. In Section 6.0, Part II, a caveat is given in the form of a footnote as follows:

> Projected enrollments in Table 3a and 4 of this Part are premised upon meeting established needs by 1976, and include occupational orientation for all students in grades 7-9. Projected enrollments in Tables 2, 3, and 4 of Part III are based upon a compilation of anticipated vocational enrollments as reported by the districts and community colleges of the State. The tables in Part III

do not include anticipated enrollments in occupational orientation programs. For these reasons, the enrollments for 1972 as projected in tables in Parts II and III are not compatible.

Since the reason espoused in the caveat for the incompatibility of data between Parts II and III is that data in Part III does not include occupational orientation, it follows that data in tables not concerned with occupational orientation should be the same. Further, since post-secondary data should not contain occupational orientation enrollment figures,[1] post-secondary data should be the same, assuming the techniques for measuring the data are valid. The two techniques in questions are those used in: (1) "The 1970 Annual Statistical Report of the Division of Vocational, Technical and Adult Education," Florida Department of Education, and the premises attached to the data contained therein for projection purposes, and (2) "District and Community College Planning Guides."

Section 5.2, Part II, Post-Secondary Objectives, projects enrollments for 1972 as:

Job Preparatory Training	147,539
Consumer and Homemaker	3,391
	150,930

[1]Section 4.0, Part II, Vocational Education Program Needs, mentions occupational orientation only when referring to grades 7-9.

Table 2a, Part III, "Details of Enrollments in Instructional Programs Planned Which Are Continuing or Expanding in FY 1971-1972," lists the number of post-secondary enrollments as 71,980. When this figure is added to the sum of post-secondary enrollments in Table 3, Part III, "New Instructional Programs Planned in FY 1972," less post-secondary occupational orientation,[1] the sum is 76,447. Even if occupational orientation enrollments were to be included in the Table 2a figure of 71,980, it is doubtful that it would amount to about 75,000 or the difference between enrollments at the post-secondary level resulting from the use of two different techniques of compilation. Therefore, on the basis of this evidence, it must be concluded that this data is not valid.

Data validity and reliability comparisons for the categories of secondary disadvantaged and handicapped are not possible because of the large numbers of occupational orientation enrollments which probably exist in Tables 2 and 2a, but which are not itemized separately.

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[1]Post-secondary occupational orientation is not alluded to in Section 5.2, Part II, Post-Secondary Objectives.

V

DEPRESSED AREA SERVICE

In Section 5.64, Part II, Consumer and Homemaking Education (Part F), it is shown that service to persons living in economically depressed or high unemployment areas is very significant, with 80 per cent of the students enrolled in consumer and homemaking education in 1970 residing in an economically depressed area as indicated on the maps in Sections 2.1 and 2.2 of Part II. It is recommended that the same type of data display appearing in Sections 5.64(e) be used in other charts of current and projected enrollments.

Section 2.13, Part III, discusses the geographic areas to be served primarily in terms of criteria for establishing which geographic areas are depressed and therefore qualify for an additional indicator of need. However, no specific programs are listed nor is the reader able to determine what amount of funds will be disbursed to specific geographic locations.

In Sections 2.1 and 2.2, Part II, Long Range Program Provisions, specific geographic areas in Florida are identified as being:

> . . . economically depressed and high unemployment areas and districts in the upper quartile of need as determined by the number of families with annual incomes of less than $3,000, number of unemployed, number receiving public assistance and number of adults 25 years of age and over with less than a fifth grade education, and districts with average household income 25 per cent or more below the state average.

Part II also states that "special emphasis will be placed upon geographic areas having large numbers of economically deprived people, with high rates of unemployment, and having a high population density." Failing to identify long range programs, services, and activities by these enumerated geographic areas, Part III, when describing State Vocational Education Programs for Secondary, Adults and Handicapped makes no mention of geographic areas in which programs will be initiated, expanded or curtailed. Under Post-Secondary a broad hedge covering criteria for program needs is given when it is stated that "Program needs will be determined by criteria identified in Part 3.1, Part I of this Plan, and described in Parts 3.0, 4.0, 5.0, and 6.0, Part II of this Plan." Incidentally, the parts cited in Part II of the Plan include everything but the labor supply and demand data (Part 1.1), economically depressed and high unemployment areas of the State (Part 2.0), and depressed districts as designated by the Florida Department of Education (Part 2.2). These are perhaps the most important criteria for determining the location and size of instruction programs to be

offered during FY 1971-1972. Only when instructional programs to be offered to disadvantaged are described is the following given: "Programs will be expanded for disadvantaged in areas identified as depressed in this Plan." Even with this statement and the remaining program information given, the reader does not know in which "depressed"[1] areas programs for the disadvantaged will be initiated or expanded.

In order to alleviate the confusion about where and why a new or expanded program is to be offered, plans citing new or expanded programs should refer directly to the charts of depressed areas or these charts should specify which programs will be initiated or expanded in the areas identified as "depressed." Similarly, reference to the amount of service to "depressed" areas could be made in the tables of service to categorical recipients (e.g., Consumer and Homemaking Education).

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[1]Again, there is a problem of determining "depressed" areas.

VI

RELIABILITY OF DATA BETWEEN 1971 AND 1972 STATE PLANS

Several instances of unreliability or inconsistency of data result when comparing data reported in the 1971 State Plan with that reported in the 1972 State Plan. These will be only briefly outlined. It is hoped that this will signal a careful review of all data in the State Plan in order to make such data consistent in the future plans.

Sections of both years' plans use 1969 and 1970 as base year data with the 1971 Plan referring to these data as "Status" or "Current Status" and the 1972 Plan alluding to them as "Current." Whatever the rubric, the data should be the same. However, the following differences occur:

Work Study (Section 5.62, Part III)

Description of Data	1971 State Plan	1972 State Plan
	1970 "Current Status"	1970 "Current"
a) Number of disadvantaged youth and adults enrolled in vocational education	38,500	24,970
b) Number of work-study participants	287	197

Evaluative comment

a) Two different sources, as footnoted, were used for arriving at each of these figures.

b) The difference here cannot be accounted for by referring to the footnotes.

Post-Secondary (Section 5.2, Part III)

Description of Data	1971 State Plan	1972 State Plan
	1969 "Status"	1970 "Current"
a) Total labor force	2,641,700	3,554,392

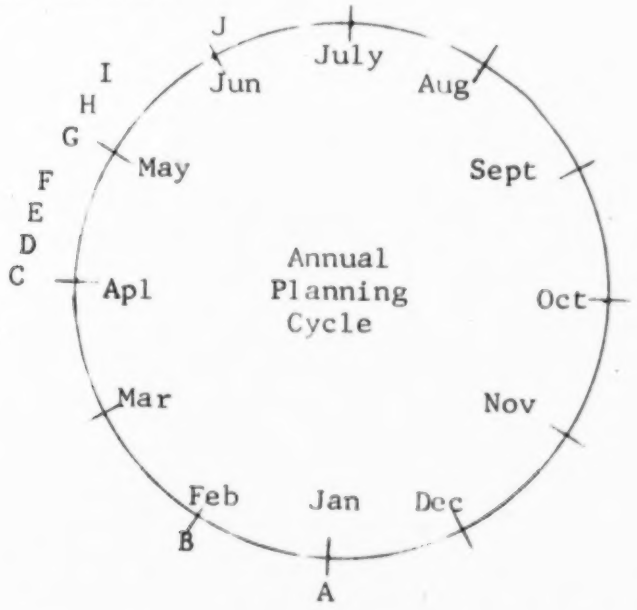
Evaluative comment

a) Using two different sources of data, the annual increase here is obviously unreliable. An annual increase of about 50,000 in the labor force is more nearly correct. Since several premises for projections of other data are based upon this figure (e.g., enrollment in adult short-term preparatory and supplemental training will equal 6 per cent of the labor force by 1976, and enrollment in post-secondary job preparatory training will equal 5 per cent of the labor force), an error of proportional magnitude will recur whenever premises or projections are based upon total labor force.

VII

TIME SEQUENCE FOR STATE PLAN PREPARATION AND DISTRIBUTION

The suggested time line for State Plan development is reported as follows:



Time Line for State Plan Development

A	Jan	State Plan Development--Initiate
B	Feb Mar	Tentative Local Applications & Recommendations for Program, Services, & Activities for Next Year (Due to State Department)
C	Apl	State Advisory Council, Consultation and Formal Review of State Plan--Due to State Department
D	Apl	State Board of Education Public Hearing of State Plan
E	Apl	State Plan Completed
F	May	State Board of Education Approval of State Plan
G	May	Tentative Approval of Local Applications--Due to Local Agencies
H	May	State Plan--Due to OE
I	Jun	Local Descriptive, Financial & Statistical Report (Previous Year)--Due to State Department
J	Jun 30	End of Fiscal Year[1]

[1]Hilton, op. cit., p. 17.

Problems encountered using the preceding suggested time frame or possibly an even later time frame, relate to the date of final release and distribution of the State Plan to appropriate and interested parties. If the State Plan is sent to Washington for approval in May, as suggested, it is unlikely that it will be printed and released before August or September, or two to three months into the relevant fiscal year. If problems arise, as has happened this year in Florida, the release data can be as late as December or January. The problem this year lies in the printing process and the anticipated delay is two to three months. In fact, this evaluation was done from a Xerox copy because printed copies were not yet available as of December, 1971.

Normally, printing requires three months and is not initiated until approval is received from the USOE, usually in August with a retroactive date to July 1. This normal time frame results in the release of printed copies sometime in October. However, an October date is not realistic when one considers that by that time some elements of the Plan may actually be history.[1] Thus, it is recommended that efforts be made to distribute copies of the State Plan as close to July 1 of each year as possible. Perhaps a more

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[1]For example, Section 2.43, Part II, Teacher Training, discusses a conference which will be held August 1-5, 1971. Yet, the distribution of the State Plan is some five months later than this date.

rapid printing of the State Plan could contribute significantly to an earlier release date.

VIII

COMPARISON OF FLORIDA'S STATE PLAN WITH OTHER SELECTED STATE PLANS

Three other State Plans have been selected for comparison with Parts I, II, and III of Florida's State Plan. Selected State Plans will be referred to as Plan A, Plan B, and Plan C. Since fiscal year 1972 State Plans from other states could not be obtained in time for this evaluation, the latest Plans available were used. The earliest Plan is Plan B which was 1970 while the remaining two were for the fiscal year 1971.

Comparison will focus upon the selections of Florida's State Plan which have been criticized herein and parts from the other State Plans which are thought to be exemplary. This will enable the Florida State Board to strengthen weak points in its State Plan when it is updated.

Comparisons of Part I

In any comparison of State Plans, particularly Part I thereof, the great degree of similarity immediately becomes apparent. This is due to the restrictive nature of the federal regulations and the uniformity of format required

by the Department of Health, Education and Welfare. Despite this uniformity, enough discretion is vested in the developers of the various State Plans to make some comparison beneficial.

A format similar to the one used in the compliance section in Part I will be utilized. Only those sections with significant improvement or unusual diversity will be noted.

1.5 Program Evaluation

Plan C sets forth in great detail provisions for program evaluation. The procedures to be followed, personnel to be involved, and criteria to be employed are all clearly stated. The clarity of presentation and extent of coverage deserves consideration in any modification of this very important section.

Plan B does not cover this section in as great detail, but the evaluation criteria established deserve review.

1.7 Cooperative Arrangements

None of the State Plans offered significant improvement over the Florida Plan for this section. Plan C does, at least, require that the information provided be used by the state employment service even though procedures for such use are not established.

1.8 Vocational Education Under Contract

Plan C presents a clear statement of the contracting requirements. While an improvement over the Florida Plan, the language concerning federal requirements could be strengthened. Neither Plan A nor Plan B allow this type of contract.

1.10A Effective Use of Results of Programs and Experiences

Plan B makes specific provision for a systematic use of program results and experiences. Some type of systematic procedure would appear desirable.

1.10B Opportunity for Hearing on Local Applications

None of the sections in the three State Plans appears adequate to meet all of the requirements of this section. Plan C provides forty-five days for notification of intent to appeal and also provides for a written record. Plan B sets forth the criteria for approval of a local application which would probably be of benefit to the local agencies.

1.10C Economically Depressed or High Unemployment Areas

None of the three Plans adequately deals with this section. Plan A does describe the size of the districts, as required, and in general offers the most complete section with some excess verbiage.

1.10D Areas of High Youth Unemployment or School Dropouts

All three of the State Plans offer different approaches to this section. All should be reviewed before any modification of the Florida section.

3.15 Vocational Educational Needs of Groups to be Served

Plan C provides a clear presentation of groups to be served and their special priority status.

3.24 Maintenance of Effort

Plan A contains a correct and adequate statement of the requirements of this section.

3.26-1 Manpower Needs and Opportunities

Plan C provides a very concise statement of this section. New and emerging employment requirements are given emphasis. Procedures are established to insure some consideration of the data collected.

3.26-3 Relative Ability to Provide Resources

None of the States adequately recognizes the two classifications required by this section. Plan C appears to provide an improvement over the Florida section but still is inadequate.

3.27-1 Application of Criteria in Determining the Relative Priority of Local Applications

Plan C provides an excellent example of one method

of establishing priority procedures. Even if the philosophy behind such a procedure is found unacceptable the ability to state clearly the procedures should be studied and emulated. The importance of this section to the entire plan demands absolute clarity of the purposes and precision in methodology.

Comparisons of Parts II and III

Each of the selected State Plans will be reviewed separately below, using reference points for comparison of: (1) analysis of manpower supply and demand, (2) clarity of state's goals and priorities, (3) service to depressed areas, and (4) any outstanding sections.

Plan A

Plan A includes considerably more OE Codes of Instructional Programs in its analysis of manpower supply and demand than does Florida's. Instructional codes and subcodes number 105 in the Plan A table while Florida's contains only twenty-four such codes. The inclusion of labor supply and demand by additional instructional programs facilitates the planning of continuing or new programs, since program outputs can be related directly to the net of projected expansion and replacement needs minus the output of other sectors.

Plan A delineates by age group the population count

in economically depressed areas of the State. Since several of Florida's economically depressed areas are sparsely populated and the mere identification of such areas does not tell the extent of vocational education program needs in terms of the numbers needing service, it is recommended that Florida's State Plan include a table which depicts an age stratification of population by areas of the State identified as depressed.

The display of vocational education program objectives by categories of persons served (secondary, post-secondary, and adult) in Plan A also includes the number of students to be served in geographic areas classified as: (1) depressed, and (2) high population density. If Florida included this information, the problem of determining the geographical location of vocational service would be partially rectified.

In Part 2.13, Part III, Geographical Areas to be Served, Plan A lists the expenditure of funds by categories of persons served and geographic areas (economically depressed and high population density). While Florida's State Plan includes expenditures by categories of persons served, it does not detail expenditures by geographic area. It is recommended that the latter be included in Florida's State Plan.

In general, Plan A is not easily read nor understood.

Like Florida's State Plan, it complies with the rigid federal procedures for development of a plan which necessarily restricts creativity and diversity. However, with the exception of the strong points in Plan A noted above, Florida's State Plan is superior in readability, intelligibility of charts and tables (Florida uses many footnotes to explain charts and tables), and the inclusion of more specific levels of achievement of goals and objectives.

Plan B

Having several pages of geographical maps, lengthy listings of existing and planned area vocational schools, and sixteen pages of general population and student data, Part II does not provide any outstanding characteristics. Similarly, Part III does not contain an exemplary section, except that section 2.13 might be reviewed. In this section each school division (city or county) is listed with a combined ranking scale of the eligibility for the distribution of funds available under the act. When this kind of ranking system is compared with a standardized priority chart (e.g., a county with a +10 rank has the highest priority), then the reader can easily determine priorities for geographical distribution of funds. Since this capability is not presently available in the Florida State Plan, it is recommended that such a system be consi ered.

Plan C

Plan C is shorter in terms of length than Florida's State Plan and approaches the level of being a true compliance document. Besides brevity, Plan C has very little to offer in Parts II and III relative to providing Florida a source of exemplary parts of the State Plan.

IX

CONCLUSION

While most of the topics discussed in this paper, when viewed individually, are technical in nature, a single overriding philosophical deficiency does emerge. The State Plan dutifully acknowledges the criteria established by the Federal Government. Much verbiage is devoted to topics concerning the disadvantaged, handicapped, unemployed, vocational needs, and new and emerging vocations. Nevertheless, it is impossible or, at best, very difficult to determine from the State Plan how the competing needs are to be weighted and priorities established; how evaluations are to be conducted and supporting data gathered; and, finally, how these priorities are to be integrated with the other required information and evaluations into a statewide program of vocational and technical education.

The National Advisory Council on Vocational Education in its fourth report released January 16, 1971, made the following observation concerning many of the State plans:

> . . . in many states it [the State Plan] falls far short of presenting what the objectives of the state are, how the state proposes to achieve them, and how long it expects that to take. Rigidly structured by the federal

> rules and regulations, the plans serve as a compliance document with specifications so meticulously detailed that its annual preparation becomes a chore for the expert in grantsmanship and its review in the Office of Education has literally been entrusted to secretaries.

This criticism of State Plans by the National Advisory Council was reinforced for the Florida Plan by a limited number of interviews with persons interested in vocational education. While the sample was too small for generalization, a consistent pattern did emerge. In general, the Florida Plan is known to exist, seldom read, and almost never consulted or used in planning.

Repeated reference to the restrictive nature of the federal regulations occur whenever the State Plan is discussed but this should not be relied upon as an excuse for lack of improvement. Much discretion is left to the State in determining relative priorities and developing programs to meet the needs of its citizens. If the Plan is to become more than a compliance document, prepared solely to meet the requirements for federal funding, much improvement in clarity of purposes and procedures for implementation is desirable. To the vocational educators of Florida, the State Plan should appear as a well conceived road map with carefully selected destinations and clearly marked paths to reach them. At present the State Plan more closely resembles a reprint of the federal laws and regulations.

X

SUMMARY OF RECOMMENDATIONS

I. It is recommended that Part I of the Plan be reviewed in order to increase compliance with federal law, and regulations promulgated thereunder.

   A. The technical legal deficiencies identified in this evaluation should be corrected.

   B. The areas of ambiguity identified in this evaluation should be reviewed and modified in accordance with federal regulations and Board policy.

II. It is recommended that Part I of the Plan be revised through the exercise of appropriate discretionary authority in order to increase its usefulness as a planning document.

   A. Each section of the Plan should be reviewed for the possible inclusion of guidelines in addition to the minimum required for compliance.

   B. Special attention should be given to the revision of the following key sections:

      1. Sections 1.10C and 1.10D should be revised in order to insure that the procedure for

identification of areas of concentration of specific populations (i.e., high unemployment, economically depressed, and school dropouts), are correctly established.

2. Section 3.15, Vocational Need of Groups to be Served, should be revised in order to insure that appropriate consideration is given to the specified population groups.
3. Section 3.26-1 should be revised in order to insure that "new and emerging manpower needs and opportunities" are properly emphasized.
4. Section 3.26 and 3.27 (i.e., determination of priority of local applications) should be revised in order to clearly reflect the established State goals and to identify the relative priorities among these goals.

III. It is recommended that in Part II of the Plan labor supply and demand data be compiled using as many sources as possible in order to provide valid data on job opportunities and manpower needs for planning purposes.

A. Specific recommendations for the preparation of the labor supply and demand table include:

1. other sector output should explicitly consider private school productio

2. occupational and geographical mobility coefficients should be included
3. high and low supply and demand occupations should be identified according to specific geographic areas of the State.

IV. It is recommended that in Parts II and III of the Plan, program plans be consistent with data given, especially the labor supply and demand data appearing in Table 1, Part II.

V. It is recommended that all goals and objectives be stated clearly and that, where possible, the criteria for achievement of each goal and objective be stated in a quantitative and measurable form. Special effort should be made to avoid phrases such as "additional programs," which suggest only direction and not magnitude. Commendation is deserved in those several instances where goals and objectives have been stated objectively.

VI. It is recommended that in Parts II and III of the Plan, priorities for each goal and objective be explicitly delineated. Priority rankings should be assigned on a short-term basis (Annual Program Plan) and long-term basis (Long Range Program Plan) according to kinds of occupational programs, level of programs (secondary, adult, etc.), type of recipients

(disadvantaged, handicapped), and geographical locations.

VII. It is recommended that the reliability and validity of data in Parts II and III be examined in light of the instruments or techniques used for gathering the data. Similar types of data should be consistent within the State Plan for a given year and between State Plans for successive years.

VIII. It is recommended that in Parts II and III of the Plan, new and/or expanding programs for secondary, adults, and handicapped persons be identified as to their geographical location in the State, especially areas identified as depressed.

IX. It is recommended that efforts be made to distribute copies of the State Plan as close to July 1 of each year as possible.

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